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January 17, 2022

Via Email

REQUEST TO FILE UNDER SEAL

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Michael Avenatti*, 19 Cr. 374 (JMF)

Dear Judge Furman:

We write pursuant to the Court's Order dated November 10, 2021 (Dkt. 160) with the list of jurors that Mr. Avenatti seeks to excuse for cause. The list below contains the jurors (identified by number), as well as a short explanation of why the juror should be excused, with reference to the specific question and response on the jury questionnaire.

We further request that this letter be filed under seal and remain under seal until the jury has been empaneled. Many of the responses below contain statements that risk causing prejudice to the jury panel, or embarrassment to specific jurors.

Juror #	Cause Challenge
3	Q. 2: [REDACTED] Q. 51, 52: [REDACTED]

4	Q. 2: [REDACTED] [REDACTED] Q. 5: [REDACTED]
8	Q. 31: [REDACTED] Q. 63: [REDACTED]
13	Q. 33: [REDACTED]
14	Q. 3, 4, 5: [REDACTED] [REDACTED]
17	Q. 2: [REDACTED] [REDACTED]
20	Q. 31: [REDACTED] [REDACTED] Q. 34, 35: [REDACTED] [REDACTED]
22	Q. 2: [REDACTED] [REDACTED] Q. 31: [REDACTED] [REDACTED] Q. 34, 35: [REDACTED] [REDACTED] Q. 36: [REDACTED] Q. 41, 42: [REDACTED] [REDACTED] Q. 43: [REDACTED]
25	Q. 48, 49: [REDACTED] [REDACTED] Q. 82: [REDACTED] [REDACTED]
27	Q. 2: [REDACTED] Q. 34: [REDACTED] [REDACTED]

29	<p>Q. 41, 42: [REDACTED]</p> <p>Q. 43: [REDACTED]</p> <p>Q. 75, 76: [REDACTED]</p> <p>Q. 77: [REDACTED]</p>
30	<p>Q. 65, 70: [REDACTED]</p>
31	<p>Q. 33: [REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p> <p>Q. 41, 42: [REDACTED]</p> <p>Q. 51, 52: [REDACTED]</p> <p>Q. 87, 88: [REDACTED]</p>
36	<p>Q. 2: [REDACTED]</p> <p>Q. 81: [REDACTED]</p> <p>Q. 82: [REDACTED]</p> <p>Q. 85: [REDACTED]</p>
38	<p>Q. 2: [REDACTED]</p>
41	<p>Q. 2: [REDACTED]</p> <p>Q. 30: [REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p> <p>Q. 67: [REDACTED]</p>
43	<p>Q. 2: [REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p>

44	Q. 2: [REDACTED] Q. 31, 32, 33: [REDACTED]
46	Q. 25, 30, 31: [REDACTED] [REDACTED] Q. 44, 45: [REDACTED] [REDACTED]
47	Q. 2: [REDACTED]
48	Q. 2: Hardship: [REDACTED] [REDACTED] Q. 31: [REDACTED] [REDACTED] Q. 44: [REDACTED]
49	Q. 2: [REDACTED] [REDACTED] Q. 34, 35: [REDACTED] [REDACTED]
55	Q. 31: [REDACTED] [REDACTED] Q. 33: [REDACTED] [REDACTED] Q. 35: [REDACTED] [REDACTED] Q. 86: [REDACTED] [REDACTED]
57	Q. 41: [REDACTED] Q. 42: [REDACTED]
58	Q. 2: [REDACTED]
63	Q. 44: [REDACTED]
64	Q. 2: [REDACTED] Q. 42: [REDACTED]

	[REDACTED]
65	Q. 51: [REDACTED]
72	Q. 34 & 35: [REDACTED]
73	Q. 22, 28, 29: [REDACTED]
77	Q. 5: [REDACTED]
78	Q. 34, 35: [REDACTED]
82	Q. 2: [REDACTED] Q. 5: [REDACTED]
84	Q. 31: [REDACTED] Q. 33: [REDACTED] Q. 45: [REDACTED]
86	Q. 2: [REDACTED] Q. 29, 31, 33: [REDACTED] Q. 34, 35, 36: [REDACTED]
94	Q. 34, 35: [REDACTED]
95	Q. 51, 52: [REDACTED]

97	<p>Q. 2: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 41, 42: [REDACTED]</p> <p>[REDACTED] ”</p>
107	<p>Q. 2: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 33: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p> <p>[REDACTED] ”</p> <p>Q. 49, 50: [REDACTED]</p> <p>[REDACTED]</p>
111	<p>Q. 33: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 35: [REDACTED]</p> <p>[REDACTED]</p>
121	<p>Q. 2: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 31: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 33: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 34, 35: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 36: [REDACTED]</p> <p>Q. 40: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 41, 42: [REDACTED]</p> <p>[REDACTED]</p>

	<p>[REDACTED]</p> <p>Q. 42: [REDACTED]</p> <p>Q. 51: [REDACTED].</p> <p>Q. 52: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 53: [REDACTED]</p> <p>Q. 54: [REDACTED]</p> <p>Q. 71: [REDACTED].</p> <p>Q. 72: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 75, 76: [REDACTED]</p> <p>Q. 79, 80: [REDACTED].</p>
131	<p>Q. 2: [REDACTED]</p> <p>[REDACTED]</p>
140	<p>Q. 1: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 34, 35, 41, 42: [REDACTED]</p> <p>[REDACTED]</p> <p>Q. 44: [REDACTED].</p>
142	<p>Q. 31: [REDACTED]</p> <p>Q. 41, 42: [REDACTED]</p> <p>[REDACTED]</p>
144	<p>Q. 31: [REDACTED]</p> <p>[REDACTED]</p>
147	<p>Q. 33: [REDACTED]</p> <p>[REDACTED]</p>
151	<p>Q. 34, 35: [REDACTED]</p> <p>[REDACTED]</p>

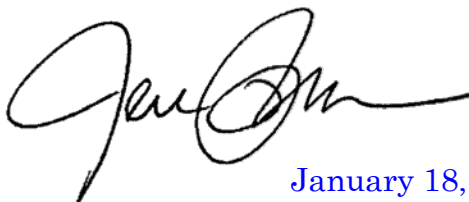
Respectfully submitted,

/s/

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Cc: Counsel of record (via ECF)

Given that the questionnaires are not public at this time, the Court agrees that the content of the Jurors' answers should remain under seal. But there is no reason that the Juror numbers and the numbers of the questions at issue should not be public -- as they are for the Government's objections. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. M. Jones", is written over the date.

January 18, 2022